

**Core Strategy Pre-Submission – Chapter 16 Creating Prosperous Communities**

Contact Person ID	Contact Full Name	Contact Company / Organisation	ID	Number	Question 1 - Legally compliant	Question 2 - Sound	Question 3 - Positively Prepared	Question 3 - Justified	Question 3 - Effective	Question 3 - Consistent with national policy	Question 4	Question 5	Question 6	Question 7	Order	Filename	
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	<a href="#">CSPS1571</a>	16							<p>Thank you for consulting the AONB on this important policy document. As the ANOB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Judith Plumley and yourself.</p> <p>The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation’s heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.</p> <p>The ANOB has looked with considerable interest at your Core Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028.</p> <p>It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.</p> <p>Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS.</p> <p>The thrust, therefore, of the AONB’s comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicted. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound.</p> <p>In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of countryside within the District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where</p>					726	<a href="#">22393370_1.pdf</a> <a href="#">22393360_1.pdf</a>

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											there is conflict with proposed development. The AONB is also concerned that Section 16, Creating Prosperous Communities, does not appear to focus on renewable energy which is both an important and sensitive issue. There should, we suggest, be policy guidance on this matter.					
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS976</a>	16.5		Yes	Yes	Yes	Yes	Yes	"Growth in employment and tourism must help to support the environment and avoid contributing to the causes of climate change." GOOD-- this is essential for sustainability.				732	<a href="#">2259130_0_1.pdf</a>
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	<a href="#">CSPS1521</a>	16.5		Yes					The recognition given to the value of the natural environment in creating prosperous communities is supported.				732	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3425</a>	16.5		Yes					The recognition given to the value of the natural environment in creating prosperous communities is supported.		No, I do not wish to participate at the oral examination		732	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3538</a>	16.8	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse non 'B' class uses.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	735	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3539</a>	16.9	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse non 'B' class uses.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	736	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3540</a>	16.10	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse non 'B' class uses.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	737	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3541</a>	16.11	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse	Yes, I wish to participate at the oral examination	To critically analyse the timing of the	738	

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												non 'B' class uses.	on	likely delivery of land for employment development within the plan period.		
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	<a href="#">CSPS403</a>	Policy PC1							Royal Mail has a number of land holdings in the District of East Dorset and the Borough of Christchurch all of which are strategically important, these are as follows: Christchurch Delivery Office Units 19-22 Avon Trading Park, Christchurch, BH23 2 BT As such should any of the land surrounding Royal Mail's sites be redeveloped, it would be vital that any new uses be designed and managed so that they are both cognisant and sensitive to Royal Mail's operations.		No, I do not wish to participate at the oral examination		739	
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS1489</a>	Policy PC1		No	No	No	No	No	RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY This response is made to supplement those made by individual parishes. Some of the points made are general to all some are specific to a few. This response does not concern itself with Christchurch Borough. Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill & Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported. The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50. <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The DEFRA maps classify the majority of East Dorset as "Less Sparse and Less Sparse Dispersed. A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that "It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income. "Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People's housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain." All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.		739		

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											<p>Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the District Strategy.</p> <p>Estates. There is no reference in the Strategy to the fact that much of the rural area of the district is made up of private estates – Cranborne, Shaftesbury, Crichele, Kingston Lacy (NT), Edmondsham, Rushmore (part of). All have a part to play and are involved in various ways in the life and economy of East Dorset; this has to be recognised.</p> <p>The Core Strategy. There is a lack of a clearly defined Aim for the document. If there is to be a Vision it should lead to an Aim “To produce a Strategy For the Development of East Dorset during the period 2013 to 2028”. Para 4.1 of the Key Strategy is therefore limiting in that it says that the strategy is only concerned with identifying the locations for development; it is putting the cart before the horse. The objectives should cover the key areas of the strategy: economy, housing, welfare, environment, communications. The policies should be specific within each key objective.</p> <p>Core Strategy Objectives. Either all the objectives cover the partnership area or all need to specify which parts they pertain to. (Obj 1 and 4). Too many of the objectives start to discuss particular aspects, which limit their application. An objective should be an achievable target from which the policy statements are derived.</p> <p>Whilst the majority of the rural economy is based on agriculture, there are also a wide variety of home workers who need stronger recognition in the strategy. Both need firm policies to support their continued existence; the national evidence would suggest that home working will increase dramatically during coming years as the price of travelling continues to rise and central government supports the improvements of the communications infrastructure.</p> <p>Generic policy statements are not sufficient to embrace them.</p> <p>Market Towns. The lack of any partnership working within East Dorset reduces the role of the market towns as a focus for their area. The location of the market towns in the south of the district does not help. There is confusion of terminology within the document between Rural Service Centres and Key Settlements.</p> <p>Communications – Broadband will play an essential part of the future of East Dorset. It is an essential requirement for farmers, home workers and the service sector. 100% coverage of mobile communications is required to ensure connection with the emergency services at all times and to make up for the poor broadband coverage. A firm policy to support enhanced communications across the rural community is essential.</p> <p>Highways. Rural roads must be maintained to support the local economy and tourist traffic which will only increase. The A354 is classified as a strategic route yet there is no strategy or policy to support this. The B3081 / B3078 / B3082 roads are all secondary and local distributor roads; within the rural community these roads are as important as the streets in the towns yet they are not recognised within the strategy or policies.</p> <p>Environmental Issues – surface water drainage. The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainages. It is essential that the District recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts</p>					

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											<p>are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering. Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of second homes is required to support the infrastructure costs of the district. Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to Eastern Area DAPTC Response to EDDC Core Strategy Submission Extract From CRC State of the Countryside Report 2010 Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> <li>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities.</li> </ul> <p>No mention is made of District owned rural sites such as Town Farm Workshops, Sixpenny Handley.</p>					
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS2495</a>	Policy PC1							No mention is made of District owned rural industrial sites such as Town Farm Workshops, Sixpenny Handley				739	<a href="#">2248860_0_1.pdf</a> <a href="#">2248941_0_1.pdf</a> <a href="#">2248948_0_1.pdf</a>
557299	Mr Peter Weatherhead	DTZ Planning	<a href="#">CSPS3173</a>	Policy PC1	No	Yes	Yes	Yes	Yes	Yes	The Malmesbury Estate objects to Policy PC1 Employment Land Hierarchy which should be amended to include the land shown on plan DTZ1 as part of the strategic allocation of employment land at Bournemouth Airport. The policy should be reworded to refer to a higher quality strategic allocation of the Airport	The adjustment of the boundary between the airport and the Green Belt designation to provide sufficient land for the long-term	Yes, I wish to participate at the oral examination	To explain our representations in full and	739	<a href="#">2254183_0_1.pdf</a> <a href="#">2254182_0_1.pdf</a>

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											business parks and "appropriate land in the immediate vicinity of the Airport". See the written representations in the letter dated 22 June 2012.	implementation of the employment provision on land to which is co-located with the airport but with public access so that occupiers and visitors are not forced to use the airport car park with its charging regime. See the written representations in the letter dated 22 June 2012, together with the formal responses made on the Estate's behalf and included in the background documents.		to have the opportunity to comment on relevant topics and debates carried out during that part of the examination that deals with the airport and related policies.		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS34 26</a>	Policy PC1	No	No	No		No		<p>Sustainability Appraisal</p> <p>SA Objective 1 Protect, enhance and expand habitats and protected species New extensions to employment sites being created on Greenfield land in East Dorset will be at the expense of significant loss of biodiversity and habitat restoration potential, particularly heathland. Air pollution and light pollution will increase and there is a significant risk of direct and diffuse pollution of watercourses, notably the Moors River system, SSSI.</p> <p>Scoring negative</p> <p>SA Objective 3 Minimise pollution If employment site extensions are taken forward to the Local Plan, meeting this objective will require detailed examination of the entire drainage from the existing and expanded industrial estates to ensure that all surface water passes through carefully designed and maintained pollution control/balancing ponds/features. Responsibility for maintenance and monitoring must be assured.in policy</p> <p>Unless recommendations are adopted scoring is negative</p>	If employment site extensions are taken forward there should be a commitment to detailed examination of the entire drainage from the existing and expanded industrial estates to ensure that all surface water passes through carefully designed and maintained pollution control/balancing ponds/features. Responsibility for maintenance and monitoring must be assured.in policy	No, I do not wish to participate at the oral examination		739	
656678	Mr James Cleary	Pro Vision Planning and Design	<a href="#">CSPS34 93</a>	Policy PC1	Yes	No	Yes	Yes	Yes	Yes	Please see enclosed representations.	Please see enclosed representations.	Yes, I wish to participate at the oral examination	1) Because of the high level of public interest in reducing greenfield land take in East Dorset in favour of optimizing previously developed land. 2) To enable the Inspector to test the evidence demonstrating that the	739	<a href="#">2258053_0_1.pdf</a>

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														Core Strategy is unsound without the allocation of Little Canford Depot for a mixed use residential and employment development.		
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3537</a>	Policy PC1	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse non 'B' class uses.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	739	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3542</a>	16.12	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse non 'B' class uses.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	740	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3543</a>	16.13	Yes	No	No	No	No	No	As a consequence of the consideration of our separate representations in respect of Policy KS 5, the land east of the Ferndown Industrial Estate should be added to the list of sites in the employment land hierarchy.	Add land east of the Ferndown Industrial Estate to the list of sites for B1, B2, B8 and other diverse non 'B' class uses.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	741	
507546	Mr Nigel Pugsley	BNP Paribas Real Estate	<a href="#">CSPS719</a>	Policy PC2	Yes	Yes					My client is supportive of policy which permits alternative uses for existing employment land where a lack of market demand can be demonstrated. it is considered that this option protects employment sites required by the market which assists the economy and provides flexibility to address other land use requirements.		No, I do not wish to participate at the oral examination		743	

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656678	Mr James Cleary	Pro Vision Planning and Design	<a href="#">CSPS3494</a>	Policy PC2							Please see enclosed representations.	Please see enclosed representations.	Yes, I wish to participate at the oral examination	1) Because of the high level of public interest in reducing greenfield land take in East Dorset in favour of optimizing previously developed land. 2) To enable the Inspector to test the evidence demonstrating that the Core Strategy is unsound without the allocation of Little Canford Depot for a mixed use residential and employment development	743	<a href="#">2258053_0_1.pdf</a>
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2235</a>	16.16	Yes	No	Yes	Yes	Yes	Yes	<p>Objection is raised to this policy as the policy is silent on residential development and it is not clear whether this should be interpreted as an indication that residential would not be supported or that it is dealt with elsewhere (and if so where?).</p> <p>It is also not clear as to the extent of the district to be covered by this policy – there is reference to the open countryside but also to some of the smaller settlements. It would appear that the policy is primarily directed to the countryside (outside of settlements) but this needs clarification in order that the policy can be properly effective.</p> <p>Whilst it is recognised that this policy relates primarily to the promotion of economic activities in the rural area, the Council's approach to the potential re-use of non-residential properties for residential purposes is unclear. Residential re-use is not listed but does not appear to be referenced elsewhere. Paragraph 55 of the NPPF lists examples where residential use of individual properties in the countryside may be appropriate but this does not appear to be addressed by this Policy or elsewhere in the Plan.</p> <p>As currently drafted, the policy is therefore unsound as it appears to be inconsistent with national policy, is not effective and not justified</p>	<p>The policy needs to be reviewed to clarify:</p> <p>a) The parts of the district it covers – the open countryside or in addition, the smaller settlements;</p> <p>b) Whether it should address in this policy residential use to comply with guidance in the NPPF or whether that will be addressed elsewhere.</p>	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in	745	



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														reaching a decision on the soundness of the Core Strategy.		
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	<a href="#">CSPS1572</a>	Policy PC3							<p>Thank you for consulting the AONB on this important policy document. As the ANOB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Judith Plumley and yourself.</p> <p>The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.</p> <p>The ANOB has looked with considerable interest at your Core Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028.</p> <p>It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.</p> <p>Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS.</p> <p>The thrust, therefore, of the AONB's comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicted. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound.</p> <p>In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of countryside within the</p>			746	<a href="#">22393360_1.pdf</a> <a href="#">22393370_1.pdf</a>	

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											District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where there is conflict with proposed development. We also note that Policy PC3 relating to the rural economy includes the AONB together with the locally determined Areas of Great Landscape Value. That does not seem to give the AONB the clarity of support that could be anticipated of a notional designation that is specifically identified as warranting special policies in connection with Paragraph 14 of the NPPF.					
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS14 92</a>	Policy PC3	No	No	No	No	No	No	<p><b>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</b></p> <p>This response is made to supplement those made by individual parishes. Some of the points made are general to all some are specific to a few. This response does not concern itself with Christchurch Borough.</p> <p>Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill &amp; Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported.</p> <p>The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50. <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The DEFRA maps classify the majority of East Dorset as "Less Sparse and Less Sparse Dispersed. A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that "It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income.</p> <p>"Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People's housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain."</p> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the District Strategy.</p> <p>Estates. There is no reference in the Strategy to the fact that much of the rural area of the district is made up of private estates – Cranborne, Shaftesbury,</p>	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.			746	

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											<p>Crichel, Kingston Lacy (NT), Edmondsham, Rushmore (part of). All have a part to play and are involved in various ways in the life and economy of East Dorset; this has to be recognised.</p> <p>The Core Strategy. There is a lack of a clearly defined Aim for the document. If there is to be a Vision it should lead to an Aim "To produce a Strategy For the Development of East Dorset during the period 2013 to 2028". Para 4.1 of the Key Strategy is therefore limiting in that it says that the strategy is only concerned with identifying the locations for development; it is putting the cart before the horse. The objectives should cover the key areas of the strategy: economy, housing, welfare, environment, communications. The policies should be specific within each key objective.</p> <p>Core Strategy Objectives. Either all the objectives cover the partnership area or all need to specify which parts they pertain to. (Obj 1 and 4). Too many of the objectives start to discuss particular aspects, which limit their application. An objective should be an achievable target from which the policy statements are derived.</p> <p>Whilst the majority of the rural economy is based on agriculture, there are also a wide variety of home workers who need stronger recognition in the strategy. Both need firm policies to support their continued existence; the national evidence would suggest that home working will increase dramatically during coming years as the price of travelling continues to rise and central government supports the improvements of the communications infrastructure.</p> <p>Generic policy statements are not sufficient to embrace them.</p> <p>Market Towns. The lack of any partnership working within East Dorset reduces the role of the market towns as a focus for their area. The location of the market towns in the south of the district does not help. There is confusion of terminology within the document between Rural Service Centres and Key Settlements.</p> <p>Communications – Broadband will play an essential part of the future of East Dorset. It is an essential requirement for farmers, home workers and the service sector. 100% coverage of mobile communications is required to ensure connection with the emergency services at all times and to make up for the poor broadband coverage. A firm policy to support enhanced communications across the rural community is essential.</p> <p>Highways. Rural roads must be maintained to support the local economy and tourist traffic which will only increase. The A354 is classified as a strategic route yet there is no strategy or policy to support this. The B3081 / B3078 / B3082 roads are all secondary and local distributor roads; within the rural community these roads are as important as the streets in the towns yet they are not recognised within the strategy or policies.</p> <p>Environmental Issues – surface water drainage. The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainages. It is essential that the District recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering.</p> <p>Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of</p>					

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											<p>second homes is required to support the infrastructure costs of the district. Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to Eastern Area DAPTC Response to EDDC Core Strategy Submission Extract From CRC State of the Countryside Report 2010 Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> <li>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities.</li> </ul> <p>Delete the reference to market towns. Spelling: Practices (noun)</p>					
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2417	Policy PC3							<p>The clues to the Parish Council's concerns start to appear at the outset in the Key Strategy section of the document. The sequence in which those objectives are defined, indicates an emerging concept of constraining development to urban areas – and all that flows from such a presumption – in order to conserve the look and feel of the countryside. Development in the country areas is heavily suppressed by the presence of green belt and various designations of natural or environmental protection. Those of us who live in the country are allowed to do so in a manner which is designed to please those who do not – but would probably want to do so if they could.</p> <p>We believe that the underlying difficulty is that neither the authors of this series of documents (nor indeed some of the newer residents of rural Dorset) can see the creeping effect which such a policy has on the community viability in the villages and hamlets. For example, we complain when village pubs become gastro-pub high-price restaurants, but the outward migration of the people who</p>				746	<a href="#">2248941_0_1.pdf</a> <a href="#">2248948_0_1.pdf</a> <a href="#">2248860_0_1.pdf</a>

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											<p>used to support the village pub as a social centre is something which we have allowed to happen as a result of the influx of high-income or retired 'rural idyll'-seekers forcing the price of housing well out of reach. When that happens, there is no further need for a pub, post office or shop and the 'central place' structure proposed in the strategy becomes the solution.</p> <p>A 'vibrant' community is surely one which encompasses a wide variety of people with an equally wide variety of skills and interests which support an active participation in community affairs. This is becoming a more and more difficult objective to achieve. We need people to sit on committees and to run organisations – but we also need people with the full range of technical and craft skills as well.</p> <p>In order to maintain or rebalance our communities we must:</p> <ul style="list-style-type: none"> <li>• Insist that affordable housing is an essential element of village development, particularly where this can lead to the maintenance of extended family groups.</li> <li>• Enable the elderly to remain in their community with the necessary care support.</li> <li>• Ensure that a broad variety of opportunities for employment is encouraged and supported wherever possible.</li> <li>• Resist the pressure of the urban dwelling planner to consider the countryside as a theme park. It is an industrial landscape with residential settlements.</li> </ul> <p>On the last point we are mindful of a comment made during the creation of the South Downs National Park – “We need a National Park to save the South Downs from the farmers!” That is seriously putting the cart before the horse as it should not be forgotten by whom and how the South Downs landscape has been developed. The rural countryside cannot be set in concrete; it is a dynamic, changing and thus developing environment and is primarily an agricultural based industry vital to the national economy. The Core Strategy barely acknowledges agriculture which has to be the largest and probably most economically significant activity in the District. Nor is there any reference to the big and ancient estates that still dominate our rural land ownership and who are the primary creators of the present Cranborne Chase landscape. However, recognition of the increased business opportunities presented by farm diversification is welcomed, although to state that such development would only be permitted to farms located on the peripheries of villages which are not to be confused with hamlets or isolated dwellings. Such a policy can only be considered unacceptably restrictive, discriminatory and very unconstructive. Under the proposed new settlement hierarchy we welcome the intention for Sixpenny Handley to be designated a Rural Service Centre (RSC). Such a designation reinforces the village's already established role as a provider of community leisure; cultural; retail; educational; health and recreational as well as other service facilities providing support for both the village and adjacent communities within the parish and beyond. However, that said, there is nothing of significance within the rest of the document as to how this role is to be maintained let alone developed reinforcing the impression that it is merely a token gesture.</p> <p>In Sixpenny Handley and Pentridge we still retain the basic ingredients of vibrancy – but only just and they are almost imperceptibly slipping away. We have to develop in order to meet the needs of Dorset's increasing population and to continue to provide the necessary services to fulfil our role as a Rural Service Centre. To that end it is disappointing to note that the prime transport corridors up here in the far north - the A354 and B3081 – with their vital public transport services barely get a mention and we wonder at times if we really are</p>					

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											<p>best served by East Dorset and might be better off in the North with its predominately rural population and outlook. Our three Main Settlements are Blandford Forum, Shaftesbury and Salisbury all of which lie not only outside East Dorset and therefore the scope of this document but in the case of the City of Salisbury - outside the county. For us Wimborne and the other East Dorset Main Settlements - the Bournemouth and Poole dormitory towns - are a long way away.</p> <p>Conclusions The draft paper is entirely lacking a strategy for the development of the rural area and thus ignores the present and future needs of almost 15% of the district's population and their potential contribution to the whole. Moreover, without a proper strategy for the rural areas, C&amp;EDDC risk losing substantial benefits from tourism and other income. It is therefore quite unacceptable for the East Dorset Local Plan to be passed to the Secretary of State for approval before these matters are thoroughly addressed.</p> <p>We most strongly support the responses and comments made by Knowlton Parish Council at Reference B and also DAPTC Eastern Area at Reference C, the vast majority of which apply similarly to Sixpenny Handley with Pentridge (from Annex to comments)</p> <p>1st Bull Point - Delete ".... market towns and ....." Last Paragraph - Spelling: Practices (noun)</p>					
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2237</a>	Policy PC3	Yes	No	Yes	Yes	Yes	Yes	<p>Objection is raised to this policy as the policy is silent on residential development and it is not clear whether this should be interpreted as an indication that residential would not be supported or that it is dealt with elsewhere (and if so where?).</p> <p>It is also not clear as to the extent of the district to be covered by this policy – there is reference to the open countryside but also to some of the smaller settlements. It would appear that the policy is primarily directed to the countryside (outside of settlements) but this needs clarification in order that the policy can be properly effective.</p> <p>Whilst it is recognised that this policy relates primarily to the promotion of economic activities in the rural area, the Council's approach to the potential re-use of non-residential properties for residential purposes is unclear. Residential re-use is not listed but does not appear to be referenced elsewhere. Paragraph 55 of the NPPF lists examples where residential use of individual properties in the countryside may be appropriate but this does not appear to be addressed by this Policy or elsewhere in the Plan.</p> <p>As currently drafted, the policy is therefore unsound as it appears to be inconsistent with national policy, is not effective and not justified</p>	<p>The policy needs to be reviewed to clarify: a) The parts of the district it covers – the open countryside or in addition, the smaller settlements; b) Whether it should address in this policy residential use to comply with guidance in the NPPF or whether that will be addressed elsewhere.</p>	Yes, I wish to participate at the oral examination	<p>The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.</p>	746	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3428</a>	Policy PC3		Yes					<p>We welcome the criteria but note the omission of reference to light pollution.(PI see 2nd response)</p>		No, I do not wish to participate at the oral examination		746	
36030	Mrs	Environment	<a href="#">CSPS34</a>	Policy						No	<p>For completeness and to comply with NPPF para 125 we recommend including</p>	<p>Amend 4. to read,</p>	No, I do		746	

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2	Hilary Chittenden	nt TAG (East Dorset)	30	PC3							reference to light pollution.	....characteristics and landscape quality of the area, including intrinsically dark skies.	not wish to participate at the oral examination			
521508	Ms Lisa Jackson	Jackson Planning Ltd	<a href="#">CSPS3650</a>	Policy PC3	Yes	No	Yes	Yes	Yes	Yes	This policy is not sound as it is currently drafted appears to suggest that the rural area only applies to East Dorset District and there is no acknowledgement of the rural area within Christchurch Borough supporting development within this category. It is possible that proposals will come forward within the Christchurch area and the policy needs to address this. In addition the policy is not consistent with national policy in the NPPF.	The policy needs to be redrafted to cover all rural areas in both Councils to make it sound. The policy also needs to reflect paragraph 28 of the NPPF.	No, I do not wish to participate at the oral examination		746	<a href="#">2267120_0_1.pdf</a>
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2238</a>	16.17	Yes	No	Yes	Yes	Yes	Yes	<p>Objection is raised to this policy as the policy is silent on residential development and it is not clear whether this should be interpreted as an indication that residential would not be supported or that it is dealt with elsewhere (and if so where?).</p> <p>It is also not clear as to the extent of the district to be covered by this policy – there is reference to the open countryside but also to some of the smaller settlements. It would appear that the policy is primarily directed to the countryside (outside of settlements) but this needs clarification in order that the policy can be properly effective.</p> <p>Whilst it is recognised that this policy relates primarily to the promotion of economic activities in the rural area, the Council’s approach to the potential re-use of non-residential properties for residential purposes is unclear. Residential re-use is not listed but does not appear to be referenced elsewhere. Paragraph 55 of the NPPF lists examples where residential use of individual properties in the countryside may be appropriate but this does not appear to be addressed by this Policy or elsewhere in the Plan.</p> <p>As currently drafted, the policy is therefore unsound as it appears to be inconsistent with national policy, is not effective and not justified</p>	The policy needs to be reviewed to clarify: a) The parts of the district it covers – the open countryside or in addition, the smaller settlements; b) Whether it should address in this policy residential use to comply with guidance in the NPPF or whether that will be addressed elsewhere.	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	747	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2229</a>	16.18	Yes	No	Yes	Yes	Yes	Yes	<p>The policy is unsound because it appears to address similar issues set out under Policy LN6. As a result the policy is not effective or justified. There needs to be a review or whether there is a need for both policies and if so, a distinction drawn between the two policies in terms of what each policy is addressing.</p> <p>It should be noted that there is a much more onerous requirements relating to the potential loss of community facilities under Policy PC4 in comparison with Policy LN6 – this is not justified or effective.</p> <p>The second part of the policy seeks to resist the loss of such facilities but the tests set out are not justified or effective or consistent with national policy as it is not clear what will be required to demonstrate compliance with the policy. There is no requirement for the word ‘clear’ in the second line of the second paragraph – this suggests a more onerous test than needing to demonstrate compliance with policy and that is unlikely to be the intention of the policy. There needs to be much greater clarity as to what will be required to meet the policy requirements – this should be set out as a requirement for evidence of</p>	Further consideration to be given to the inter-relationship between Policy LN6 and PC4. The second paragraph to be deleted and replaced with: Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if it can be demonstrated that there is no longer a need for the community facility/service through a sufficient and realistic marketing of the current use over a period of at least 9 months to show that the current use is unviable.	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be	748	

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											<p>marketing of the property for a period of time (9 months) in order to demonstrate:</p> <p>a) Insufficient demand b) Not feasible to support continued existence.</p> <p>Objection is also raised to the policy requirement to demonstrate that the loss would not result in a substantial decline in the range and quality of services for local people. The principal reason why local facilities and services close is because they are not supported and used by local people and cannot therefore be continued as a viable business. These are almost exclusively private businesses that have no public subsidy or alternative funding mechanisms – as a result if the business folds through lack of support and is therefore no longer viable, there can be no economic or social justification for seeking to keep the facilities. The policy would be likely to result in premises being left vacant, boarded up and derelict making no positive contribution to the local economy and community. This would conflict with the core principles set out under the NPPF.</p> <p>The policy needs to be reworded to ensure that a firm and proper test, through appropriate marketing is put in place to ensure that the policy objectives are realistic and are clear and effective.</p> <p>The adjoining authority, Purbeck District Council is at the final stages of the preparation of its Core Strategy and is recommending through its Post EIP Modifications the following policy:</p> <p>Policy CF (second part) Safeguarding Existing Facilities and Services: Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if it can be demonstrated that there is no longer a need for the community facility/service through a sufficient and realistic marketing of the current use over a period of at least 9 months to show that the current use is unviable.</p> <p>This policy is clear, effective and consistent with guidance in the NPPF and is therefore recommended.</p>	<p>This amendment would make the policy clear, effective and consistent with guidance in the NPPF and is therefore recommended.</p>		<p>properly informed in reaching a decision on the soundness of the Core Strategy.</p>		
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2232</a>	16.19	Yes	No	Yes	Yes	Yes	Yes	<p>The policy is unsound because it appears to address similar issues set out under Policy LN6. As a result the policy is not effective or justified. There needs to be a review or whether there is a need for both policies and if so, a distinction drawn between the two policies in terms of what each policy is addressing.</p> <p>It should be noted that there is a much more onerous requirements relating to the potential loss of community facilities under Policy PC4 in comparison with Policy LN6 – this is not justified or effective.</p> <p>The second part of the policy seeks to resist the loss of such facilities but the tests set out are not justified or effective or consistent with national policy as it is not clear what will be required to demonstrate compliance with the policy. There is no requirement for the word ‘clear’ in the second line of the second paragraph – this suggests a more onerous test than needing to demonstrate compliance with policy and that is unlikely to be the intention of the policy. There needs to be much greater clarity as to what will be required to meet the policy requirements – this should be set out as a requirement for evidence of marketing of the property for a period of time (9 months) in order to demonstrate:</p> <p>a) Insufficient demand</p>	<p>Further consideration to be given to the inter-relationship between Policy LN6 and PC4. The second paragraph to be deleted and replaced with: Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if it can be demonstrated that there is no longer a need for the community facility/service through a sufficient and realistic marketing of the current use over a period of at least 9 months to show that the current use is unviable. This amendment would make the policy clear, effective and consistent with guidance in the</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a</p>	749	



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											<p>b) Not feasible to support continued existence. Objection is also raised to the policy requirement to demonstrate that the loss would not result in a substantial decline in the range and quality of services for local people. The principal reason why local facilities and services close is because they are not supported and used by local people and cannot therefore be continued as a viable business. These are almost exclusively private businesses that have no public subsidy or alternative funding mechanisms – as a result if the business folds through lack of support and is therefore no longer viable, there can be no economic or social justification for seeking to keep the facilities. The policy would be likely to result in premises being left vacant, boarded up and derelict making no positive contribution to the local economy and community. This would conflict with the core principles set out under the NPPF.</p> <p>The policy needs to be reworded to ensure that a firm and proper test, through appropriate marketing is put in place to ensure that the policy objectives are realistic and are clear and effective.</p> <p>The adjoining authority, Purbeck District Council is at the final stages of the preparation of its Core Strategy and is recommending through its Post EIP Modifications the following policy: Policy CF (second part) Safeguarding Existing Facilities and Services: Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if it can be demonstrated that there is no longer a need for the community facility/service through a sufficient and realistic marketing of the current use over a period of at least 9 months to show that the current use is unviable. This policy is clear, effective and consistent with guidance in the NPPF and is therefore recommended.</p>	NPPF and is therefore recommended.		decision on the soundness of the Core Strategy.		
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS97Z</a>	Policy PC4							<p>"In local shopping areas and villages planning applications which propose improvements to the provision of shops which provide for people's day to day needs, leisure uses including public houses and facilities for local communities will be supported in principle. The loss of existing retail premises, leisure and other local facilities will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of services for local people." GOOD-- This is essential to prevent isolation of satellite communities, which is otherwise likely to occur as Peak Oil and rising fuel prices make transport increasingly unaffordable.</p>				750	<a href="#">2259130_0_1.pdf</a>
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS1495</a>	Policy PC4	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY This response is made to supplement those made by individual parishes. Some of the points made are general to all some are specific to a few. This response does not concern itself with Christchurch Borough. Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill &amp; Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross.</p>	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.			750	

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											<p>Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported.</p> <p>The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50.  <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The DEFRA maps classify the majority of East Dorset as "Less Sparse and Less Sparse Dispersed. A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that "It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income.</p> <p>"Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People's housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain."</p> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the District Strategy.</p> <p>Estates. There is no reference in the Strategy to the fact that much of the rural area of the district is made up of private estates – Cranborne, Shaftesbury, Crichel, Kingston Lacy (NT), Edmondsham, Rushmore (part of). All have a part to play and are involved in various ways in the life and economy of East Dorset; this has to be recognised.</p> <p>The Core Strategy. There is a lack of a clearly defined Aim for the document. If there is to be a Vision it should lead to an Aim "To produce a Strategy For the Development of East Dorset during the period 2013 to 2028". Para 4.1 of the Key Strategy is therefore limiting in that it says that the strategy is only concerned with identifying the locations for development; it is putting the cart before the horse. The objectives should cover the key areas of the strategy: economy, housing, welfare, environment, communications. The policies should be specific within each key objective.</p> <p>Core Strategy Objectives. Either all the objectives cover the partnership area or all need to specify which parts they pertain to. (Obj 1 and 4). Too many of the objectives start to discuss particular aspects, which limit their application. An objective should be an achievable target from which the policy statements are derived.</p> <p>Whilst the majority of the rural economy is based on agriculture, there are also a wide variety of home workers who need stronger recognition in the strategy. Both need firm policies to support their continued existence; the national evidence would suggest that home working will increase dramatically during</p>					

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											<p>coming years as the price of travelling continues to rise and central government supports the improvements of the communications infrastructure. Generic policy statements are not sufficient to embrace them. Market Towns. The lack of any partnership working within East Dorset reduces the role of the market towns as a focus for their area. The location of the market towns in the south of the district does not help. There is confusion of terminology within the document between Rural Service Centres and Key Settlements.</p> <p>Communications – Broadband will play an essential part of the future of East Dorset. It is an essential requirement for farmers, home workers and the service sector. 100% coverage of mobile communications is required to ensure connection with the emergency services at all times and to make up for the poor broadband coverage. A firm policy to support enhanced communications across the rural community is essential.</p> <p>Highways. Rural roads must be maintained to support the local economy and tourist traffic which will only increase. The A354 is classified as a strategic route yet there is no strategy or policy to support this. The B3081 / B3078 / B3082 roads are all secondary and local distributor roads; within the rural community these roads are as important as the streets in the towns yet they are not recognised within the strategy or policies.</p> <p>Environmental Issues – surface water drainage. The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainages. It is essential that the District recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering.</p> <p>Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of second homes is required to support the infrastructure costs of the district.</p> <p>Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to Eastern Area DAPTC Response to EDDC Core Strategy Submission Extract From CRC State of the Countryside Report 2010 Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> </ul>					

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											<ul style="list-style-type: none"> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> <li>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities.</li> </ul> Resisting the closure of a non profitable rural retail premises is not going to make it profitable. A policy is required that provides support for that community.					
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS1956</a>	Policy PC4							Shopping/tourism is a vital aspect of life in our area. We wholeheartedly support this policy.				750	
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS2497</a>	Policy PC4							Resisting the closure of a non profitable rural retail premises is not going to make it profitable. A policy is required that provides support for that community and encourages business investment.				750	<a href="#">2248948_0_1.pdf</a> <a href="#">2248941_0_1.pdf</a> <a href="#">2248860_0_1.pdf</a>
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2233</a>	Policy PC4	Yes	No	Yes	Yes	Yes	Yes	The policy is unsound because it appears to address similar issues set out under Policy LN6. As a result the policy is not effective or justified. There needs to be a review or whether there is a need for both policies and if so, a distinction drawn between the two policies in terms of what each policy is addressing. It should be noted that there is a much more onerous requirements relating to the potential loss of community facilities under Policy PC4 in comparison with Policy LN6 – this is not justified or effective. The second part of the policy seeks to resist the loss of such facilities but the tests set out are not justified or effective or consistent with national policy as it is not clear what will be required to demonstrate compliance with the policy. There is no requirement for the word ‘clear’ in the second line of the second paragraph – this suggests a more onerous test than needing to demonstrate compliance with policy and that is unlikely to be the intention of the policy. There needs to be much greater clarity as to what will be required to meet the policy requirements – this should be set out as a requirement for evidence of marketing of the property for a period of time (9 months) in order to demonstrate: a) Insufficient demand b) Not feasible to support continued existence. Objection is also raised to the policy requirement to demonstrate that the loss would not result in a substantial decline in the range and quality of services for local people. The principal reason why local facilities and services close is because they are not supported and used by local people and cannot therefore be continued as a viable business. These are almost exclusively private businesses that have no public subsidy or alternative funding mechanisms – as a result if the business folds through lack of support and is therefore no longer	Further consideration to be given to the inter-relationship between Policy LN6 and PC4. The second paragraph to be deleted and replaced with: Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if it can be demonstrated that there is no longer a need for the community facility/service through a sufficient and realistic marketing of the current use over a period of at least 9 months to show that the current use is unviable. This amendment would make the policy clear, effective and consistent with guidance in the NPPF and is therefore recommended.	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	750	

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											<p>viable, there can be no economic or social justification for seeking to keep the facilities. The policy would be likely to result in premises being left vacant, boarded up and derelict making no positive contribution to the local economy and community. This would conflict with the core principles set out under the NPPF.</p> <p>The policy needs to be reworded to ensure that a firm and proper test, through appropriate marketing is put in place to ensure that the policy objectives are realistic and are clear and effective.</p> <p>The adjoining authority, Purbeck District Council is at the final stages of the preparation of its Core Strategy and is recommending through its Post EIP Modifications the following policy:                      Policy CF                      (second part)                      Safeguarding Existing Facilities and Services:                      Development (including change of use) that would result in the loss of existing community facilities/services will only be permitted if it can be demonstrated that there is no longer a need for the community facility/service through a sufficient and realistic marketing of the current use over a period of at least 9 months to show that the current use is unviable.                      This policy is clear, effective and consistent with guidance in the NPPF and is therefore recommended.</p>						
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3432</a>	16.21		Yes					ETAG welcomes recognition of the role of our natural and historic built environment in tourism and the local economy, the need to avoid visitor pressure on the Heaths, and the use of sustainable transport.				752		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3433</a>	16.22		Yes					ETAG welcomes recognition of the role of our natural and historic built environment in tourism and the local economy, the need to avoid visitor pressure on the Heaths, and the use of sustainable transport.				753		
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3767</a>	16.22							We support the statement made in paragraph 16.22 which states that the Core Strategy adopts a “sustainable approach to tourism in avoiding harmful impacts on important natural features which make the area attractive to visitors and in reducing recreational pressure on sensitive habitats, the Dorset heathlands and the New Forest”.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as	753		

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														highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	<a href="#">CSPS1574</a>	Policy PCS							<p>Thank you for consulting the AONB on this important policy document. As the AONB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Judith Plumley and yourself.</p> <p>The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.</p> <p>The AONB has looked with considerable interest at your Core Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028.</p> <p>It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.</p> <p>Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS.</p> <p>The thrust, therefore, of the AONB's comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicted. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the</p>			754	<a href="#">2239337_0_1.pdf</a> <a href="#">2239336_0_1.pdf</a>	

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											<p>additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound.</p> <p>In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of countryside within the District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where there is conflict with proposed development.</p> <p>Whilst we welcome the support for the aims and objectives of the AONB in Policy PC5, Tourism, we would also wish to see similar support for AONB Management Plan purposes as set out in Management Policy K4 in connection with Community infrastructure Levy / developer contributions within this Core Strategy.</p> <p>I realise there are quite a lot of issues raised by the AONB and, as I have said, we would encourage the Planning Authorities to be more robust and more specific in their policies to ensure that policy gaps created by Government are covered by locally determined policies.</p>						
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	<a href="#">CSPS2078</a>	Policy PC5	Yes	Yes					Natural England support the Policy PC5 and paragraphs 16.22 - 23.		No, I do not wish to participate at the oral examination		754		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3431</a>	Policy PC5		Yes					ETAG welcomes recognition of the role of our natural and historic built environment in tourism and the local economy, the need to avoid visitor pressure on the Heaths, and the use of sustainable transport.				754		
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3768</a>	Policy PC5							We note the intention in this policy to protect and enhance the area's environment whilst delivering investment in tourism. This is challenging, but we welcome the ambition of the Councils to protect and enhance the assets tourists wish to visit. Unconstrained growth in tourism would threaten the environmental assets of the area, and must be resisted.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as	754		

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														highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
663588	Mr Roger Street	Christchurch Conservation Trust	<a href="#">CSPS3744</a>	Policy PC5							<p><b>6. COMMENT/ COMPARISON OF POLICIES IN TOWN PLAN AND CORE STRATEGY</b></p> <p>CCT expresses concern regarding the combining of existing Town Plan policies into a new Core Strategy policy which fails to specifically include some of these existing policies. For example, Core Strategy policy PC5 is stated to include existing town plan policies ET1 (loss of tourism accommodation), L17 (development of undeveloped rivers and harboursides) and L19 (development of indoor/outdoor recreation facilities). However, Core Strategy PC5 fails to embody the detailed local conditions described in L17 where the development of currently undeveloped riversides and harboursides is conditioned. Core Strategy policy HE1 is stated to replace Town Plan policies BE19 and BE 20. These latter two policies relate to Ancient Monuments and local archaeology, along with Policy BE21 which is stated to have been deleted and not incorporated into HE1. Policy BE21 is crucial in planning matters as it details the procedure for dealing with sites of potential archaeological significance. CCT requests that BE21 be incorporated into Core strategy HE1 and that further detail from policies BE19, and BE20 be included. Currently the section on Protection of Buildings of Local Historic and Architectural Interest contains the word “archaeological” just once! A similar section in the Town Plan, entitled “ Buildings of local architectural or historic interest” contains the word “Archaeological” eighteen times and “Archaeology” twice. CCT asks why the importance of archaeology has been downgraded in this new policy HE1.</p> <p>Christchurch is renowned for its conservation areas and it is difficult to understand why Town Plan Policy BE1 has been deleted. It is a key policy for development/alteration or extension in a conservation area. Policies BE2 and BE3 follow from this initial policy so CTT would have expected BE1 to remain as a saved policy, especially as BE2 and BE3 have been saved. CCT requests that BE1 remains as a saved policy. In similar vein, CCT asks why Town Plan policy BE13, which relates to demolition of listed buildings, has been deleted while Policies BE14 (Alterations to listed buildings), BE15 (Setting of listed buildings) and BE16 (Maintenance of views from important buildings) remain as saved policies. CCT also asks why policy BE17 (Control of advertisements on listed buildings) has also been deleted.</p> <p>CCT notes that Town Plan policy ENV15, concerned with wildlife corridors, has been incorporated into Core strategy ME1. Turning to policy ME1 (at pages 153/155) there is no mention of wildlife corridors. The Town Plan at pages 21/22 devotes nearly a page to this subject, which although described as non-designated sites are increasingly seen as vital to nature conservation.</p>				754	



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523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS37 87</a>	Policy PC5		No			Yes		<p>Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry &amp; Knight Ltd, who are the owners and developers of Hoburne Farm Estate, which includes land east of phase 8 of the Hoburne Farm Estate (SHLAA reference 8/11/0525); and are the owners and operators of Hoburne Caravan Park (SHLAA reference 8/11/0287). Our clients support the Council in their objective to progress and adopt a Local Plan for the area as quickly as possible. This will provide clarity and certainty for the development industry and all those who interact with the planning system. More importantly it will assist the Council in its efforts to address the significant housing land supply shortages in the borough, particularly over the next five years.</p> <p>We have reviewed the plan and its evidence base and conclude that revisions are needed if the Council are to satisfy the tests of soundness in the NPPF. The following paragraph/policy specific comments are therefore made to assist the Council in finalising the plan before it is formally submitted to the Secretary of State.</p> <p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p> <p>Policy PC5 – Tourism</p> <p>Comment Use of word 'Protecting' is insufficiently flexible to endure the plan period. There may well be instances where site rationalisation offers greater net gains to the area, providing similar or even reduced provision, but alongside new social or economic uses that act as enabling development to fund better tourism facilities on the same or other attraction sites in the area. The tourism policies of the plan need to be flexible enough to respond to changes in the market over the plan period. Site provision and extent should therefore be tailored to the market and not just viability, allowing the Council to promote a flexible supply of land to support the tourism market and encourage investment.</p>	<p>Suggested Change</p> <p>Revise third bullet point to include after word 'viable', 'and/or it can be proved that an alternative use would not have a detrimental impact on the ability to attract such visitors to Christchurch and East Dorset.'</p> <p>In addition, given the importance of the tourism sector for the local economy, our client would have expected to see a less generic policy than that proposed. A more comprehensive policy or SPD is considered appropriate for this important sector. This would assist the Council in their determination of future planning applications on such sites.</p>	Yes, I wish to participate at the oral examination	We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.	754	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS37 69</a>	16.23							<p>We welcome paragraph 16.23 which identifies the Councils' explicit commitment to managing its assets, its involvement in the Dorset Heathlands IPF, and the subsequent SPD and Joint Heathlands DPD.</p>		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as	755	

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